

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON, DIVISION

UNITED STATES OF AMERICA

VS

H-17-219

MARCUS ESQUIVEL

**UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE**

Marcus Esquivel, through counsel George D. Murphy, Jr., requests that his conditions of release be amended to allow him to travel for work related reasons anywhere within the Continental United States. In support, Mr. Esquivel presents the following:

I.

On April 12, 2017, Mr. Esquivel was indicted for three counts of making false statements on his tax return. On April 14, 2017, he was released on \$10,000 unsecured bond. As a condition of his release, Mr. Esquivel may travel throughout Texas and also to Louisiana, Nevada and California. On October 11, 2017, Mr. Esquivel pled guilty and he is scheduled to be sentenced on January 19, 2019.

Mr. Esquivel recently became employed as an adjuster for Parker Loss Consultants (PLC). PLC's adjusters respond to claims of loss – often after disasters – throughout the continental United States. When notified of an assignment to investigate and value an individual's claim of loss, Mr. Esquivel must be on the site of the loss within 48 hours. His ability to respond immediately to the location of the loss is critical to his employment.

It is impractical to seek the court's permission each time Mr. Esquivel needs to travel for work related reasons. Therefore, Mr. Esquivel requests permission to travel anywhere within the Continental United States when on an assignment for his employer, PLC.

II.

Mr. Esquivel's pretrial services officer, Ms. Maria Baez, and Assistant United States Attorney Robert Johnson are unopposed to this motion.

Respectfully submitted,

/s/ George D. Murphy, Jr.  
George D. Murphy, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of August, 2018, I electronically filed the foregoing Unopposed Motion to Amend Conditions of Release with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Robert Johnson  
Assistant United States Attorney  
Robert.s.johnson@usdoj.gov

/s/ George D. Murphy, Jr.  
George D. Murphy, Jr.

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ORDER

The defendant's Unopposed Motion to Amend Conditions of Release is GRANTED. The defendant may travel within the Continental United States for work purposes only.

SIGNED this \_\_\_\_ day of August, 2018.

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Honorable Lee Rosenthal